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November 15, 2023

VIA ECF

Hon. Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street, Room 1620
New York, New York 10007

**Re: Abadi v. American Airlines Group Inc., et al.
Case No. 1:23-cv-04033-LJL**

Dear Judge Liman:

This office represents the following sixteen defendants in the above-captioned case: Austrian Airlines AG, Air Canada, Cathay Pacific Ltd., China Southern Airlines Company Limited, Emirates, Etihad Airways P.J.S.C., Eva Airways Corporation, Finnair OYJ, Gulf Air Holding B.S.C., Alia - The Royal Jordanian Airlines Company, Kenya Airways, Korean Air Lines Co., Ltd., Lufthansa Systems Americas, Inc., Anita Ayala, Swiss International Air Lines AG and Turkish Airlines, Inc. (collectively “Defendants”).

As of the date of this letter motion, ten of these Defendants have been served and their responses to Plaintiff’s Complaint are due as follows:

<i>Defendant</i>	<i>Deadline to Respond to Complaint</i>
Austrian Airlines AG	January 9, 2024
Air Canada	December 4, 2023
Cathay Pacific Ltd.	December 4, 2023
Emirates	November 30, 2023
Etihad Airways P.J.S.C.	November 20, 2023
Eva Airways Corporation	January 9, 2024
Finnair OYJ	November 29, 2023



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Gulf Air Holding B.S.C.	November 20, 2023
Lufthansa Systems Americas, Inc.	January 9, 2024
Swiss International Air Lines AG	January 9, 2024

We expect to file Waivers of Formal Service for the following Defendants within the next several weeks: China Southern Airlines Company Limited, Alia - The Royal Jordanian Airlines Company, Kenya Airways, Korean Air Lines Co., Ltd., Anita Ayala (employee of Lufthansa Systems Americas, Inc.) and Turkish Airlines, Inc.

Given the varying deadlines for responsive pleadings and to facilitate effective use of the Court's resources, Defendants respectfully request that the Court set/extend the deadline to respond to the Complaint in the above-captioned action to **January 9, 2024**. This will allow Defendants time to file a single joint responsive pleading to the Complaint.

Parties met and conferred via telephone on November 14, 2023 and November 15, 2023. Plaintiff does not object to the foregoing. Defendants have not made any prior requests for an extension of time to respond to Plaintiff's Complaint. There are no upcoming scheduled court conferences.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Andrew J. Harakas".

Andrew J. Harakas
Christopher Carlsen

cc: All counsel of record (via ECF)